UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : 3:14-CR-

v.

BRAD BROWN OSTRANDER, : (Judge

Defendant.

INFORMATION

| <u>Count 1</u> 18 U.S.C. § 371

(Conspiracy to Possession with Intent to Deliver and Delivery of Controlled Substance Analogues)

Beginning on or about the first day of December, 2012, the exact date being unknown, and continuing thereafter until on or about the first day of December, 2013, within the Middle District of Pennsylvania, and elsewhere, the defendant,

BRAD BROWN OSTRANDER,

did knowingly, intentionally and unlawfully combine, conspire, confederate and agree together with Corey Dobbins, Chad McLinko, Erin White and other persons both known and unknown to commit certain offenses against the United States, namely; to knowingly, intentionally, and unlawfully manufacture, distribute, and possess with

the intent to distribute a mixture or substance containing a detectable amount of alpha-pyrolidinopentiophenone (a-pvp), a controlled substance analogue as defined in 21 U.S.C. § 802(32), with intent for human consumption as provided in 21 U.S.C. § 813, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their coconspirators sought to accomplish the objectives of the conspiracy included, among others, the following:

- 1. The defendant and/or his co-conspirators acquired and possessed a controlled substance analogue with intent to distribute the substance.
- 2. The defendant and/or his co-conspirators arranged for the sales of the controlled substance analogue.
- 3. The defendant and/or his co-conspirators accepted money or other valuable consideration in exchange for the controlled substance analogues.

OVERT ACTS

In furtherance of this conspiracy, and to effect and accomplish the objects of the conspiracy, the defendant and/or his co-conspirators did commit and cause to be committed the following overt acts, among others, in the Middle District of Pennsylvania, and elsewhere:

- 1. The defendant and/or his co-conspirators purchased bulk quantities of the alpha-pyrolidinopentiophenone (α-pvp), a Schedule I controlled substance analogue within the meaning of Title 21 U.S.C. § 802(32).
- 2. The defendant and/or his coconspirators repackaged the controlled substance analogue into smaller packages for the purpose of selling the substance.
- 3. The defendant and/or his co-conspirators received money and other valuable consideration in exchange for the controlled substance analogues.

All in violation of Title 18, United States Code, Section 371.

Date: 7. /. / 4

PETER J/SMITH

UNITED STATES ATTORNEY